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March 1, 2017

BY E-FILING
Hon. Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

Re: Ambridge v. Domino Media Group, Inc., et ano.
15 Civ. 9944 (VSB)

Dear Judge Broderick:

We represent defendants Domino Media Group, Inc. and Cliff Sirlin (collectively, "Domino") in the above-referenced action. At the pre-motion conference held on January 26, 2017 regarding Domino's upcoming motion to compel arbitration, the Court directed the parties to report back by February 1, 2017 as to a briefing schedule, whether there are any discovery disputes, and whether the parties are willing to mediate before Magistrate Judge Gorenstein prior to engaging in briefing on the arbitration issue.

By letters dated February 1 and 15, 2017, we requested two week extensions to address requests for documents made by counsel for plaintiff Brittany Ambridge ("Plaintiff" or "Ambridge") that were in the hands of a non-party, and the Court granted those requests.

The parties have now conducted the above-referenced discovery, and have jointly agreed to accept Your Honor's suggestion of participating in mediation before Magistrate Judge Gorenstein prior to engaging in briefing on the motion to compel arbitration. Accordingly, the parties jointly request that the Court refer this action to mediation before Magistrate Judge Gorenstein, and that briefing on the arbitration issue, as well as discovery and any other proceedings, be put on hold until the mediation is concluded. The parties will attempt to engage in mediation at Magistrate Judge Gorenstein's earliest convenience.

As set forth above, this is the third request for an extension. Thank you for the Court's consideration of this matter.

Respectfully submitted,
/s/ Gerry Silver
Gerry Silver, Esq.

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